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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**
19

20 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
21 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF RANDALL S. LUSKEY
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL**

22 This Document Relates to:
23 ALL ACTIONS
24

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

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DECLARATION OF RANDALL S. LUSKEY

I, Randall S. Luskey, having personal knowledge of the following state:

1. I am a Partner of the law firm Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively “Uber”). I am a member in good standing of the Bar of the State of California. I know the following facts to be true of my own knowledge.

2. I respectfully submit this declaration in support of Uber’s Administrative Motion to Seal, Dated February 28, 2025.

3. I have reviewed the Declarations of Dara Khosrowshahi, Travis Kalanick, Jill Hazelbaker, Rachel Whetstone, Sachin Kansal, Frank Chang, Sarfraz Maredia and Ryan Graves submitted in support of Uber’s Memorandum of Points and Authorities in support of its Motion for a Protective Order, dated February 28, 2025. These Declarations includes confidential information about Uber’s internal systems, affairs, organizational structure and division of responsibilities, as well as discussion of Uber’s safety features, products and operations not generally known to the public. The Declarations of Messr. Khosrowshahi, Kalanick, Kansal and Chang and Ms. Hazelbaker on the same subject matter were also sealed in the parallel JCCP case against Uber and sealing them is necessary to avoid disparate treatment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 28, 2025 in San Francisco, California.

/s/ Randall Luskey

Randall Luskey